



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

MAY

VIA CERTIFIED MAIL/RETURN RECEIPT REQUESTED  
AND TELEFAX

4WD-SSRB

Justin Martindale  
Special Projects  
Alabama Department of Environmental  
Management  
Post Office Box 301463  
Montgomery, AL 36130-1463

YELLOW

RE: Olin Corp./McIntosh Plant Superfund Site  
McIntosh, Alabama

Dear Mr. Martindale:

Thank you for bringing to my attention your concern on the discrepancy presented in the Draft Record of Decision (ROD) regarding the No Action alternative and its level of protectiveness. This table was taken directly from the Olin Remedial Investigation Report where Olin concluded that the No Action alternative was considered protective of human health and the environment. However, EPA has determined that the current Corrective Action Program does not address all areas of contamination present at the site. This is further explained in the enclosed table. This correction will be incorporated in the next issuance of the ROD.

I hope that these modifications will address all of the concerns that you may have had on the Draft ROD. Please feel free to contact me at (404)347-3555 vmx6238.

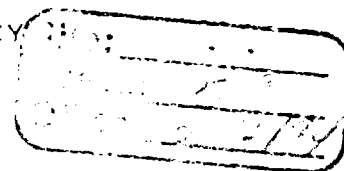
Sincerely,

Kenneth A. Lucas  
Remedial Project Manager  
South Superfund Remedial Branch

Enclosure

cc: Dan Cooper, ADEM

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**SUMMARY OF DETAILED ANALYSIS  
OU-1 GROUNDWATER**

<b>Alternative</b>	<b>Overall Protection of Human Health and Environment</b>	<b>Compliance With ARARs</b>	<b>Long-Term Effectiveness and Permanence</b>	<b>Reduction of Toxicity, Mobility and Volume</b>	<b>Short-Term Effectiveness</b>	<b>Implementability</b>	<b>Present Worth Cost Estimate (\$1,000)</b>
Alternative A:  No Action with Continuation of the Existing RCRA CAP	May not be protective.  Although Olin is committed by RCRA post-closure permit to operate the CAP until the established clean-up standards are achieved the CAP does not address all areas of contamination at the Site. Specifically the area of dense brine accumulation and possible offsite contamination.	May not comply:  RCRA permit levels, MCLs and MCLGs are chemical-specific ARARs. May comply with action-specific ARARs. However, the existing RCRA permit can not address the HSWA requirements under Federal law and regulations.	Effectiveness and permanence dependent on ability of the RCRA permit to address all areas of contamination at the site.	Reduces toxicity, mobility and volume of some contaminants but will not address the area of dense brine accumulation.	No short-term adverse effects.	Already Implemented	None